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January 10, 1996

INCOME.

Ms. Anne Castellina Superintendent Kenai Fjords National Park P.O. Box 1727 Seward, AK 99664

#### Dear Ms. Castellina:

The State of Alaska has reviewed the Draft Frontcountry Development Concept Plan / Environmental Assessment (DCP/EA) for Kenai Fjords National Park. This letter represents the consolidated comments of the State's resource agencies.

### Visitor Center Alternatives

The State of Alaska supports expanded visitor center facilities in Seward to accommodate visitor need. The NPS visitor center is overwhelmed with visitors during the heavy visitor season and, given its size, is not sufficient to deliver visitor services for the front country independent of an additional facility.

We concur with the National Park Service (NPS) that a growing number of visitors will continue to place an increasing demand on existing facilities. These demands include visitors seeking shelter from the weather while wating for scheduled activities, as well as those seeking information about natural resources and opportunities for fishing, hunting, sightseeing, boating, camping, and other recreational activities in the area, including areas outside the Park.

Because of this growing need we encourage the NPS to further consult with the City of Seward, Seward Chamber of Commerce, State of Alaska resource agencies, University of Alaska, Alaska Sea Life Center (and any other organizations which oversee visitor facilities and services or are responsible for land and resource management in the area), on how best to efficiently meet this need, including the opportunities for a cooperative visitor facility, prior to selecting a preferred alternative.

Alaska State Parks is interested in continuing it's arrangement with NPS to have an interpretive display maintained within the facility. The Alaska State Parks' Marine Recreation Project (funded by the Exxon Valdez Criminal Settlement) may be able to assist with funding for an upgraded display compatible with the new visitor center. The Alaska Department of Fish and Game (DFG) would welcome the opportunity to provide information concerning fish and wildlife, and opportunities for fishing, hunting, and wildlife watching in a cooperative visitor facility, especially in light of State responsibility to manage the fish and wildlife resources which many visitors are pursuing. Although there are currently no DFG staff located in Seward year around, there are summer staff in the area and printed information can be made available. DFG also has a program to fund improvements for public use of sport fish resources.

Appendix E, page 146, quotes the Alaska National Interest Lands Conservation Act (ANILCA) with regards to the location of visitor facilities. This section of ANILCA was adopted with the intent that priority be given to local landowners in providing visitor facilities. It was Congress' desire to assist local residents in improving the economy through the providing of facilities and services where possible, with preference given to local Native Corporations. We urge NPS to pursue a cooperative visitor center, with local entities overseeing management/ownership of the facility, in order to best meet the needs of the community as well as visitors.

The DCP/EA also contains an analysis of the NPS desires for an administrative facility, in addition to visitor services, near the small boat harbor. We note that there is little available space in the small boat harbor for expansion of marine-related facilities, including facilities for agencies such as Alaska DFG. We urge NPS to further consider locating administrative facilities elsewhere in order to lessen the impact on the boat harbor. However, of the proposals, Alternatives D and E appear to be the most effective in addressing facility needs for public contact, providing they include sufficient space for necessary administrative staff and are capable of serving the visitor center needs of all cooperating agencies. Having federal and state staff in one building may assist efficient, accurate communication between staff and greater ability to respond to public needs. Further, in terms of service to the public, a consolidated facility may provide greater convenience.

#### Exit Glacier Alternatives

The State of Alaska supports adoption of an active management strategy for Exit Glacier in order to ensure a quality experience for visitors. Given the recent growth in visitation to the Glacier, a "pro-active" management strategy is imperative. Alternative B provides a solution to vehicle crowding in a fashion that preserves the existing recreational experience. Once the parking lot is full, the existing shuttle system provides access for glacier visitors. However, there may come a time when, regardless of parking lot size, the numbers of visitors using a

shuttle system will significantly impact the quality of the recreational experience. We recommend that a carrying capacity evaluation be undertaken for the glacier to determine the limits appropriate for the shuttle system.

## Coastal Zone Management Act (CZMA) Compliance

The alternatives discussed in this DCP/EA are within the Kenai Peninsula Borough Coastal Management District. Federal regulations (15 CFR 930.30 through 930.44) promulgated under the CZMA require that all federally conducted activities (including development projects) directly affecting the coastal zone are to be undertaken in a manner consistent to the maximum extent practicable with approved State coastal management programs. Federal agencies are required to provide the state with a "consistency determination" at the earliest practicable time in the planning of the activity, following development of sufficient information to determine consistency with the coastal management program but before the Federal agency reaches a significant point of decision making.

The State finds no mention of these CZMA requirements, nor is there discussion of how CZMA compliance will be integrated into this planning/environmental assessment process. We urge the NPS to address the CZMA requirements as soon as possible but certainly no later than in the final DCP/EA.

# Additional Comments

- 1. At page 4, for the benefit of readers, we suggest that the section titled "Purpose and Significance of Kenai Fjords National Park" include the ANILCA provisions specific to the Park.
- 2. At page 8, the "projected visitation growth" is derived from visits to the visitor center, not actual visits to the Park. The Park itself experiences much lower visitor numbers except at the only road accessible point Exit Glacier.
- 3. At page 26, the ferry dock depicted on the base maps was decommissioned in 1995. The Alaska Ferry now uses the Alaska Railroad dock.
- 4. At page 78, top, add "Wolverine" to the list of species that occur and may be affected.
- 5. At page 131, for the benefit of readers, we suggest complete citations of appropriate ANILCA sections, such as all of Title I, and the Title II section which established the park. Other sections which specify management and access provisions applicable to park lands in Alaska could also be included.

The State of Alaska appreciates the opportunity to provide these comments, and looks forward to reviewing the final DCP/EA in light of these concerns. If you have any questions please call me at 269-7476.

Sincerely,

Alan Phipps

Project Review Coordinator

cc: Joan Darnell, Division of Environmental Quality, NPS

Ken Pendelton, Planning, NPS

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